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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF ALEXANDRA CARITIS
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC., RASIER, LLC, AND
RASIER-CA, LLC'S MOTION TO STRIKE
SUPPLEMENTAL REPORT OF MINETTE
E. DRUMWRIGHT, PH.D.**

**[PURSUANT TO FED. R. CIV. P. 37 AND L.R.
37-1]**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Alexandra Caritis, declare as follows:

2 1. I am an attorney licensed to practice law in the State of Texas and admitted pro hac vice in
3 this action. I am a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants
4 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I make this declaration
5 of my own personal knowledge in support of Uber’s Motion to Strike Supplemental Report of Minette E.
6 Drumwright, Ph.D. If called as a witness, I could and would competently testify to the matters set forth
7 herein. I have knowledge of the facts set forth herein, and if called to testify as a witness, could do so
8 competently under oath.
9

10 2. Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37-1, in an effort to seek
11 Plaintiffs’ agreement to the relief sought in the above-referenced discovery motion, counsel for Uber
12 initiated a meet-and-confer process.
13

14 3. On October 29, 2025, I sent an email to Rachel Abrams, Esq. of Peiffer Wolf Carr Kane
15 Conway & Wise, LLP, who serves as the Court-appointed Co-Lead Counsel for Plaintiffs in this
16 proceeding, and Ellyn Hurd, Esq. of Simmons Hanly Conroy LLP, a member of the Court-appointed
17 Federal/State Liaison Counsel Committee, requesting a telephone call regarding Uber’s anticipated
18 Motion to Strike Supplemental Report of Minette E. Drumwright, Ph.D.
19

20 4. Following that email, also on October 29, 2025, I conferred via telephone with Ms.
21 Abrams regarding the anticipated motion.

22 5. Following my telephonic meet-and-confer with Ms. Abrams, she sent an email to me,
23 copied to additional counsel for Plaintiffs who hold leadership roles in this proceeding, setting forth her
24 understanding of Uber’s anticipated motion and indicating that Plaintiffs disagree with Uber’s position.

25 I declare under penalty of perjury under the laws of the United States and the State of California
26 that the foregoing is true and correct.
27

28 Executed on October 30, 2025, in Houston, TX.

/s/ Alexandra Caritis

Alexandra Caritis

E-FILING ATTESTATION

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn
Laura Vartain Horn